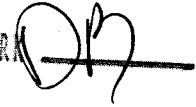


CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DEPUTY CLERK

2011 MAY 19 PM 3:11


UNITED STATES OF AMERICA §
 §
v. § No. 3:10-CR-083-L
 §
ABDEL QADER SALEH §
 §

FACTUAL RESUME

Abdel Qader Saleh, defendant, his attorney David Finn, and the United States of America, stipulate and agree to the following elements of the offense and facts supporting the plea:

ELEMENTS OF THE OFFENSE

Possession of Goods Stolen from Interstate Shipment

18 U.S.C. § 659

First: That someone stole the property described in the indictment from a motortruck, trailer, or other vehicle as alleged in the indictment, while such property was moving as part of an interstate shipment of freight;

Second: That the defendant thereafter possessed such property knowing that it had been stolen as charged; and

Third: That such property then had a value in excess of \$1,000.

STIPULATED FACTS

1. On or about February 3, 2010, in the Dallas Division of the Northern District of Texas, defendant Abdel Qader Saleh possessed goods, i.e., twenty-eight (28) cardboard boxes containing a number of bottles of amoxicillin, a prescription antibiotic drug, which had been stolen from an interstate cargo shipment in the Dallas, Texas area on or about February 3, 2008. The shipment had originated at the warehouse of National Consolidation Service in Alsip, Illinois on January 31, 2008. The amoxicillin was intended by Walgreen's to be delivered to the Walgreen's warehouse located in Waxahachie, Texas. The amoxicillin had been shipped to Texas by tractor-trailer as part of an interstate shipment of freight. The shipment was stolen before delivery to the Walgreen's warehouse while part of an interstate shipment by a person or persons who intended to deprive Walgreen's of its use and benefit permanently.

2. On or about February 3, 2010, the stolen amoxicillin was discovered in Unit P616 of the Pack n' Stack self storage warehouse on W. Northwest Highway in Dallas, Texas by an employee of the storage center. The stolen amoxicillin was contained in twenty-eight (28) cardboard boxes. A few days later, that discovery was reported to federal law enforcement agents, who obtained a search warrant and seized the stolen drugs. At all times between February 3, 2008 and February 3, 2010, Defendant Abdel Qader Saleh paid the rent for Unit P616. Saleh admits that on or about February 3, 2010, he physically possessed and exercised dominion and control over the stolen amoxicillin

knowing that the amoxicillin was stolen. Saleh stored the stolen amoxicillin in Pack n' Stack self storage warehouse Unit P616, a self storage unit for which he paid rent and to which he had access.

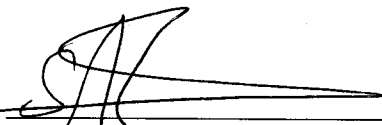
3. On or about February 3, 2010, the stolen amoxicillin possessed by Saleh at the self storage warehouse had a value in excess of \$1,000.00.

AGREED TO AND SIGNED this 19TH day of May, 2011.

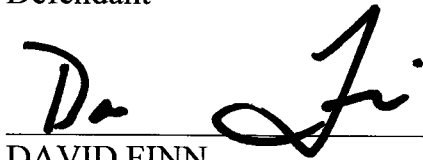
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ABDEL QADER SALEH
Defendant



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